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Cap. capital € 4,500,000 V.A.T.  
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Tax code and VAT no. VAT EN 05997110019  
EEA Reg. IT080200000831  
Batteries and Accumulators Reg. IT09060P00000301  
Certif. ISO 9001 - ISO 14001 - BS OHSAS 18001  
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## ReeR SpA - Code of Ethics

### 1 FOREWORD.

ReeR SpA (hereinafter also "ReeR"), headquartered in Turin, is an Italian company, founded in 1959, dedicated to the design, manufacture and marketing of electronic and optoelectronic equipment for industrial automation, safety and lighting, with registered office in Turin and facilities in Turin and Leini.

This document, referred to as the "Code of Ethics" (hereinafter also the "Code"), defines the values and principles of conduct by which ReeR intends to be guided in the performance of its business and in the conduct of its affairs. It contains the set of rights, duties and responsibilities of ReeR towards stakeholders, such as, by way of example, shareholders, employees, suppliers, consultants, customers, supplementing and in addition to what is provided for in the legislation.

### 2 VALIDITY AND APPLICABILITY

The Code of Ethics applies to ReeR and to the companies controlled by ReeR, in Italy or abroad, and is therefore binding for the conduct of all the collaborators of such companies or of all those who, for any reason and regardless of the type of contractual relationship, contribute to the achievement of the company's purposes and objectives (including persons with employment contracts and/or other forms of individual contractual collaboration). ReeR undertakes to require that the principles of this Code are also observed by all those parties (ReeR subsidiaries or affiliates, partners, customers, suppliers, professionals and other types of external parties) with whom it comes into contact in relation to the achievement of its objectives. The Code of Ethics is valid both in Italy and abroad, although in consideration of the cultural, social and economic diversity of the various countries in which ReeR operates and of the possible adaptations required by the specific legislation of the country.

### 3 RECIPIENTS.

All those who work in the interests of ReeR SpA are obliged to comply with the Code, and in particular:

- ReeR partners, also in the form of legal entities;
- Legal representatives and directors of ReeR;
- Members of the Board of Auditors;
- General attorneys, special attorneys, persons with power of attorney ad acta and their proxies;
- ReeR executives;
- Employees and persons in a coordinated and continuous collaboration or project collaboration relationship;
- Persons who have a consultancy or professional service, agency, mandate, with or without representation, mediation and business procurement relationship with ReeR;
- Parties that have economic relations with ReeR, such as suppliers or business partners.

The persons required to comply with the principles of the Code are hereinafter referred to as "Addressees".

### 4 DISSEMINATION OF THE CODE OF ETHICS.

ReeR undertakes to promote the sharing, adherence to and dissemination of this Code, working to ensure that the principles set out herein are accepted and observed by all addressees. The administrative body and persons in top management positions are entrusted with the task of implementing this principle, identifying the most suitable means to disseminate this Code. Personnel are in any case ensured adequate knowledge and understanding of the Code through the implementation of training courses. ReeR undertakes to:

- distribute a copy of this Code to all employees and any person who has business dealings with ReeR, by means of publication on the company website.

- ensure its periodic review and updating in order to adapt it to evolving civil awareness, environmental conditions and regulations
- ensure the confidentiality of the identity of whistleblowers, without prejudice to their legal obligations and professional protection;

## **5 GENERAL ETHICAL PRINCIPLES.**

### **5.1 Respect for the law.**

In carrying out its activities, ReeR pursues its objectives in compliance with international, EU, national and local laws and regulations. To this end, the addressees of this Code are required to operate in absolute compliance with the laws and regulations in force in all the countries in which ReeR operates. ReeR undertakes not to initiate or continue any relationship with parties who do not intend to comply with the principle of legality. It is ReeR's duty to inform its employees about applicable regulations and related issues and to ensure an adequate continuing education programme. Under no circumstances is it permitted to pursue or realise ReeR's interest in violation of the law.

### **5.2 Ethical-behavioural principles.**

ReeR intends to inspire the performance of its activities by observing the following principles of ethics and business ethics.

#### **a) Honesty, moral integrity, fairness and responsibility.**

ReeR considers it of fundamental importance that the performance of its activities be characterised by respect for ethics and values of fairness in corporate behaviour and towards third parties. The addressees of the Code must, therefore, in the performance of their professional activities, maintain a conduct oriented towards respect for the fundamental principles of honesty, moral integrity, fairness and responsibility, establishing relations based on loyalty, mutual respect and cooperation.

#### **b) Transparency.**

ReeR guarantees the observance of the value of transparency, committing itself to provide true, complete and clear information. ReeR promotes informed action and the sharing of knowledge, recognising the value of correct information to shareholders and corporate bodies regarding facts concerning the management of ReeR. To this end, all financial, accounting and management transactions must meet the requirements of completeness and accuracy.

#### **c) Confidentiality.**

ReeR ensures the confidentiality of the information in its possession, refraining from seeking confidential data, except in cases of express and conscious authorisation and specific regulatory provisions. All information in ReeR's possession is processed in compliance with the laws in force on the protection of personal data. It is expressly forbidden for the addressees of the Code to communicate, disclose or use confidential information of which, for any reason, they have come into possession, without the express consent or authorisation of ReeR.

#### **d) Respect for the person.**

ReeR respects the fundamental rights of people by protecting their dignity and moral integrity and guaranteeing equal opportunities. In both internal and external relations, behaviour that is discriminatory based on political and trade union opinions, religion, race, ethnicity, nationality, age, sex, sexual orientation, state of health and in general any characteristic is not permitted. ReeR sees diversity as an opportunity to be exploited in innovation and development through dialogue and the exchange of opinions, ideas and experiences. ReeR is opposed to any form of racism or xenophobia.

ReeR endeavours to ensure that, within the scope of its activities, the rights set out in the "Universal Declaration of Human Rights" are guaranteed in the various countries in which it operates.

**e) Equal Opportunities**

The professional development and management of employees are based on the principle of fairness and equal opportunities; recognition of the results achieved, managerial skills and professional competencies expressed by people are the essential criteria for career and salary advancement, in continuous and systematic comparison with the market, guaranteeing transparency on the method of evaluation and communication. It prevents, discourages and manages any situation of injustice or discrimination in the workplace, as well as any situation of bullying, violence or harassment.

**f) Child labour / child exploitation**

ReeR rejects and condemns all forms of child labour and child exploitation, by implementing all the necessary measures within its own organisation and by its suppliers to ensure adequate monitoring against this phenomenon.

In the event that ReeR becomes aware of a case of child labour/child exploitation at one of its suppliers in Italy or abroad, ReeR undertakes to instruct the supplier to avoid the use of child labour and shall permanently terminate all relations with it, reserving the right to claim damages and to intervene in support of the children involved.

**g) Forced labour**

ReeR rejects and condemns any form of forced or compulsory labour, by implementing all the necessary measures within its own organisation and by its suppliers to ensure adequate monitoring against this phenomenon.

In the event that ReeR becomes aware of a case of 'forced labour' ('modern slavery') at one of its suppliers in Italy or abroad, ReeR undertakes to instruct the supplier to avoid any form of irregular work and shall permanently terminate all relations with it, reserving the right to claim damages and to intervene in support of the workers involved.

**h) Illegal hiring**

ReeR ensures that all job opportunities at ReeR are available solely on the basis of the candidates' merits. ReeR, or any company responsible for recruiting personnel, does not accept cash payments or other forms of payment for employment opportunities and will bear the costs associated with the selection process.

ReeR undertakes to verify with new employees that during the recruitment process and during the course of employment, in Italy and abroad, no sums of money are requested from job seekers. If a case falling within this description is discovered, ReeR undertakes to terminate all relations with the organisation that committed the act and to reimburse the worker for the sum paid, seeking recourse from the organisation that demanded payment.

**i) Fairness and loyalty in competition.**

ReeR observes the applicable competition rules, operating in accordance with the principles of fairness, fair competition and transparency and eschewing conduct that may constitute unfair competition.

**j) Respect for the environment.**

ReeR, which has always been sensitive to the issue of sustainable development, carries out its business activities in compliance with all applicable environmental protection regulations; ReeR maintains an ISO 14001 management system in order, whenever possible, to go beyond the mandatory requirements dictated by legislation.

**k) Product quality and safety.**

ReeR operates with the aim of offering its customers the highest standards of product quality and safety. With this in mind, ReeR invests in research, ensuring ever higher levels of technology and quality.

ReeR maintains an ISO 9001 quality management system in order to achieve the highest quality standards in the field.

As a company active in the field of occupational safety, ReeR maintains an ISO 45001 system and is committed to the highest standards in the field.

**6 PRINCIPLES IN RELATIONS WITH EMPLOYEES.****a) Value of human resources.**

ReeR guarantees and promotes the development of human resources, establishing relations with personnel based on criteria of impartiality, fairness and correctness, enhancing individual capacities with absolute respect for equal opportunities, as well as fostering the development of professionalism.

**b) Duties of the ReeR.**

In order to make the best use of human resources, ReeR is committed to

- comply with labour legislation, not tolerating any form of irregular work;
- proceed with personnel selection with exclusive attention to matching the candidates' profiles to the company's needs and requirements, while respecting equal opportunities for all stakeholders;
- apply the meritocratic and professional criterion when taking any decision concerning the career or any other aspect of the employment relationship with its employees and collaborators;
- provide continuous and adequate training to its employees and collaborators, in order to ensure ever greater professionalism in the performance of the tasks entrusted to them;
- ensure full compliance with all applicable prevention and protection regulations, thus ensuring a safe and healthy working environment;
- countering, including with disciplinary sanctions or termination of employment, conduct contrary to the principles of the Code or of the law and/or of an appropriate professional conduct.
- In Italy and abroad, to pay wages that comply with the minimum values defined by local legislation (where applicable) and that allow its workers to enjoy decent living conditions in accordance with the guidelines provided by relevant global organisations.
- In its offices in Italy and abroad, to provide adequate training to its workers in order to avoid potential risks at work. To this end, individuals or teams are appointed to monitor working conditions and follow a continuous training programme with periodic updates.

**c) Duties of personnel.**

Staff are obliged to respect the principles set out in the Code and demand compliance with them, and to base their professional conduct on the principles of fairness, loyalty and efficiency. Personnel is required to:

- refrain from pursuing personal interests to the detriment of corporate interests;
- act prudently to protect the company's assigned assets and prevent their improper use by others;
- refrain from disclosing to third parties or using for private purposes information acquired in the performance of assigned activities;
- report any conduct by others in violation of the law or of the principles of this Code and/or of an appropriate professional conduct to the head of the area to which they belong and/or to the Company's management.

Compliance with the rules of this Code shall be considered an essential part of the contractual obligations of ReeR's employees, pursuant to and for the purposes of Article 2104 of the Civil Code. Violation of the rules of the Code of Ethics may result in disciplinary measures and compensation for damages arising therefrom.

**d) Conflict of interest.**

ReeR's employees, collaborators and consultants are bound to exclusively pursue ReeR's objectives and interests. ReeR is committed to preventing and avoiding any situation in which a conflict of interest may arise that may influence the independence of judgement of those involved in transactions.

## **7 PRINCIPLES IN RELATIONS WITH THIRD PARTIES.**

When initiating and managing business relations with customers and suppliers, ReeR's directors, employees and collaborators must comply with the principles of the Code and the provisions of the management and control system. It is strictly forbidden to establish and maintain relations:

- with persons involved in unlawful activities, or engaged in crime or known to be connected with criminal associations;
- with parties that do not intend to observe the ethical principles of this Code;

- with parties that refuse to provide reasonable guarantees of reliability in accordance with the law and the principles of fairness.

**a) Relations with suppliers.**

Relations with suppliers must be conducted in compliance with the principles contained in this Code and in particular in observance of the values of maximum transparency, clarity and fairness. The choice of suppliers must be based on objective criteria, such as proven professionalism and competence, reliability, efficiency, quality and convenience of the service offered. Recipients are prohibited from accepting from suppliers free gifts, presents and the like, aimed at obtaining direct benefits for themselves or for the company or obtaining confidential information. Only so-called 'customary gifts', which are customarily exchanged on festive occasions, are therefore ~~only~~ permitted. Recipients are required to report any attempt or situation to alter normal business relations.

**b) Purchasing processes.**

Purchases must be executed observing the utmost transparency and guaranteeing the traceability of transactions, through an appropriate documentation and archiving system. Contracts for amounts exceeding those established by the Board of Directors must be viewed, approved and signed by persons with appropriate powers of administration.

**c) Customer relations.**

ReeR promotes the utmost impartiality in customer relations, rejecting any form of customer approach that violates competition law or constitutes an unlawful act. Contracts and customer communications must comply with the following requirements:

- clarity and comprehensibility of language;
- compliance with current legislation;
- completeness of information.

Directors and staff are prohibited from making gifts, gratuities or benefits aimed at influencing customer choices.

## **8 OTHER REGULATORY PRINCIPLES**

For all matters not provided for herein, express reference is made to the Italian National Labour Contract for the Private Metalworking Industry and the Code of Ethics of Confindustria, editions in force.

## **9 COMPANY COMPLIANCE**

ReeR and its Companies, in Italy and abroad, are bound to be compliant to all the local legal requirements and regulations. ReeR SpA, through its Company Management and Administration Management, supervises the compliance to the local requirements as implemented by the local CEOs, who may be supported, every time this is needed, by especially appointed local consultants and/or by the ReeR SpA Management itself.

Turin 18<sup>th</sup> of July 2025